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Attorneys for Plaintiff, U.S. Bank National Association As Legal Title Trustee For Truman 2016 SC6 Title Trust

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 U.S. BANK NATIONAL ASSOCIATION AS
11 LEGAL TITLE TRUSTEE FOR TRUMAN
12 2016 SC6 TITLE TRUST,

13 Plaintiff,

14 vs.

15 STEWART INFORMATION SERVICES
16 CORP.; STEWART TITLE GUARANTY
17 COMPANY; DOE INDIVIDUALS I through
18 X; and ROE CORPORATIONS XI through
19 XX, inclusive,

20 Defendants.

Case No.: 2:21-cv-01875-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO
RESPOND TO STEWART
INFORMATION SERVICES CORP.'S
MOTION TO DISMISS [ECF No. 4]**

[First Request]

19 COMES NOW Plaintiff, U.S. Bank National Association As Legal Title Trustee For
20 Truman 2016 SC6 Title Trust ("U.S. Bank") and Defendant Stewart Information Services Corp.
21 ("SISC"), by and through their counsel of record, hereby stipulate and agree as follows:

- 22 1. On September 14, 2021, U.S. Bank filed its Complaint in Eighth Judicial District Court,
23 Case No. A-21-841029-C [ECF No. 1-1];
- 24 2. On October 11, 2021, Defendants filed a Petition for Removal to this Court [ECF No. 1];
- 25 3. On October 12, 2021, SISC filed its Motion to Dismiss for lack of personal jurisdiction
26 [ECF No. 4];
- 27 4. U.S. Bank's deadline to respond to SISC's Motion to Dismiss is currently October 26,
28 2021;

5. U.S. Bank is requesting a brief extension until Wednesday, November 3, 2021, to file its response to the Motion to Dismiss;
6. This extension is requested to allow the Parties additional time to review and file a stipulation to stay litigation pending the Ninth Circuit's resolution of an appeal in *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Ninth Cir. Case No. 19-17332 (District Court Case No. 3:19-cv-00241-MMDWGC) (the "*Wells Fargo II* Appeal"). The Parties anticipate that the Ninth Circuit Court of Appeals' decision in the *Wells Fargo II* Appeal may touch upon issues involved in the instant litigation;
7. Counsel for SISC does not oppose the requested extension;
8. This is the first request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 26th day of October, 2021.
WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Dragon
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DATED this 26th day of October, 2021.
MAURICE WOOD

/s/ Brittany Wood
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8250 West Charleston Blvd., Suite 100
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*Attorney for Defendants Stewart
Information Services Corp. and Stewart
Title Guaranty Company*

IT IS SO ORDERED.

DATED October 27, 2021


UNITED STATES DISTRICT JUDGE